

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE PERIOD FROM  
JULY 1, 2022 THROUGH JULY 31, 2022**

Debtor: LTL Management LLC

Applicant: McCarter & English, LLP

Case No.: 21-30589-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: October 14, 2021 (the "Petition Date")

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**SECTION 1  
FEE SUMMARY**

<input checked="" type="checkbox"/> Monthly Fee Application No. 9	<input type="checkbox"/> Interim Fee Application	<input type="checkbox"/> Final Fee Application
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Summary of Amounts Requested for the Period from July 1, 2022 through July 31, 2022 (the "Ninth Statement Period").

Total Fees Owed by LTL:	\$56,599.90
Total Disbursements Owed by LTL:	\$0.00
Total Fees Plus Disbursements:	\$56,599.90
Minus 20% Holdback of Fees:	\$11,319.98
Amount Sought at this Time:	\$45,279.92

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fees Requested to LTL:	<u>\$628,897.03</u>	<u>\$646.32</u>
Total Fees Allowed to Date:	<u>\$453,263.30</u>	<u>\$574.97</u>
Total Retainer (If Applicable):	<u>\$0</u>	<u>\$0</u>
Total Holdback (If Applicable):	<u>\$125,779.41</u>	<u>\$0</u>
Total Received by Applicant:	<u>\$539,309.40</u>	<u>\$646.31</u>

<b>Name of Professional &amp; Title</b>	<b>Year Admitted</b>	<b>Hours</b>	<b>Rate (discounted from standard)</b>	<b>Fees</b>
Thomas W. Ladd, Esq., Partner	1986	34.3	\$805	\$27,611.50
Brett Kahn, Esq., Partner	2008	38.5	\$570	\$21,945.00
Jennifer Farina, Esq., Partner	2005	5.8	\$585	\$3,393.00
Andrew G. Heckler, Esq., Associate	2019	.5	\$410	\$205.00
Ashley D. McWilliams, Esq., Associate	2019	2.8	\$410	\$1,148.00
Georgia Bender, Esq., Associate	2021	5.7	\$365	\$2,080.50
Deborah Brown, Paralegal		13.5	\$290	\$3,915.00
		101.1		\$60,298.00

## SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEES
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) Asset Disposition: Sales, leases, abandonment and related transaction work.		
c) Avoidance Action Litigation: Preference and fraudulent transfer litigation.		
d) Business Operations: Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) Case Administration: Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.		
f) Claims Administration and Objections: Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) Employee Benefits/Pensions: Review issues such as severance, retention, 401K coverage and continuance of pension plan.		
h) Fee/Employment Applications: Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	2.9	\$2,193.50
i) Fee/Employment Objections: Review of an objections to the employment and fee applications of others.		
j) Financing: Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.		
k) Litigation: Other than Avoidance Action Litigation (there should be a separate category established for each major matter).		
l) Meetings of Creditors: Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.		
m) Plan and Disclosure Statement: Formulation, presentation and confirmation; compliance with the plan confirmation order, related		

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEES</b>
orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.		
n) Relief from Stay Proceedings: Matters relating to termination or continuation of automatic stay under 362.		
o) Accounting/Auditing: Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) Business Analysis: Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		
q) Corporate Finance: Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) Data Analysis: Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) Litigation Consulting: Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	98.2	\$58,104.50
t) Reconstruction Accounting: Reconstructing books and records from past transactions and bringing accounting current.		
u) Tax Issues: Analysis of tax issues and preparation of state and federal tax returns.		
v) Valuation: Appraise or review appraisals of assets.		
w) Travel Time: Please note that non-working travel time must be billed at 50% of cost.		
<b>SERVICE TOTALS</b>	101.1	\$60,298.00

**SECTION III  
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
Photocopies – @ \$.07/page	\$0.00
<b>DISBURSEMENTS TOTALS</b>	\$0.00

**SECTION IV  
CASE HISTORY**

1. Date of Retention: December 16, 2021, effective as of the Petition Date [Dkt. 861] (the “Retention Order”).<sup>1</sup>

2. Summary explaining the nature of the work performed and the results achieved:<sup>2</sup>

During the Ninth Statement Period, McCarter & English professionals and paraprofessionals performed the following work on behalf of the Debtor:

- Assisted with preparations for hearings and of motions and other documents, as related to insurance coverage issues, in connection with this chapter 11 bankruptcy case;
- Assisted with preparations for discovery tasks in relation to insurance coverage issues;
- Analyzed insurance policies and related case materials with respect to insurance coverage issues arising in bankruptcy;
- Analyzed bankruptcy case materials with respect to issues impacting the New Jersey coverage litigation;
- Analyzed insurer document productions with respect to issues impacting insurance coverage issues;
- Communicated with other Debtor counsel as appropriate regarding various insurance coverage issues and related strategy; and
- Conducted legal research on discrete insurance coverage issues arising in bankruptcy and issues impacting New Jersey coverage litigation.

I certify under penalty of perjury that the above is true.

Date: August 25, 2022

/s/ Thomas W. Ladd  
Thomas W. Ladd

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<sup>1</sup> The Retention Order is attached hereto as Exhibit A.

<sup>2</sup> The summary set forth below is qualified in its entirety by reference to the time and services detail in the invoices attached hereto as Exhibit B.